

**SAO**

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

DANIELLE RHODES, an individual; and JUAN TERRI  
RHODES, an individual,

Plaintiff,

v.

STATE FARM FIRE AND CASUALTY COMPANY, a  
foreign corporation; DOE INDIVIDUALS I-X,  
inclusive; and ROE CORPORATIONS I-X, inclusive,

Defendants.

Case No. 2:23-cv-00023-GMN-DJA

**STIPULATION AND ORDER TO EXTEND  
DISCOVERY PLAN (FIRST REQUEST)**

Pursuant to LR IA 6-1 and LR 26-3, it is hereby stipulated and agreed between the parties that the current discovery dates in this matter be continued ninety (90) days. The parties request that all other future deadlines contemplated by the Discovery Plan and Scheduling Order be extended pursuant to the local rule. In support of this stipulation and request, the parties state as follows:

**A. DISCOVERY THAT HAS BEEN COMPLETED:**

1. Plaintiff provided Initial Disclosures.
2. Defendant provided Initial Disclosures.
3. Plaintiff propounded written discovery to Defendant.
4. Defendant propounded written discovery to Plaintiff.

**B. DISCOVERY REMAINING:**

1. Depositions of the parties' lay witnesses;
2. Initial Expert Disclosures;

3. Rebuttal and Supplemental Expert Disclosures;
4. Depositions of the parties' expert witnesses; and
5. Any other potential depositions or written discovery which may become necessary as discovery continues.

**C. REASONS REMAINING DISCOVERY CANNOT BE COMPLETED WITHIN THE TIME SET BY PRIOR DISCOVERY PLAN:**

The parties have diligently engaged in discovery in this matter. However, due to unforeseen circumstances, the parties believe that an extension of the current discovery and trial deadlines is necessary to complete the remaining discovery, including the independent medical evaluation of Plaintiff by Plaintiff's life care planner. Good cause exists for the extension because both Plaintiff's life care planner is unable to take on new cases until the second week of May, which will not provide the expert with enough time to produce a report ahead of the initial disclosure deadline. Thus, a continuance of the current discovery and trial deadlines is necessary to allow Plaintiff's expert to properly prepare his report in advance of the deadline.

The parties are requesting a 90-day extension of the discovery deadlines to allow the parties' experts to conduct their initial records reviews and any independent medical evaluations deemed necessary and to allow sufficient time to complete the necessary remaining discovery thereafter. No party will be prejudiced by the extension, and the requested extension is made in good faith and not for purposes of delay. Based on the foregoing, the parties respectfully request that the Court grant their joint request to extend the discovery deadlines by 90 days, in accordance with the requested amended discovery deadlines.

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**D. PROPOSED SCHEDULE FOR COMPLETION OF DISCOVERY**

**Current Discovery Deadlines:**

Last day to amend pleadings and add parties	April 24, 2023
Last day to disclose initial experts:	May 12, 2023
Last day to disclose rebuttal experts:	June 12, 2023
Close of Discovery:	July 11, 2023
Last day to file Dispositive Motions:	August 10, 2023

**Proposed Discovery Deadlines:**

Last day to amend pleadings and add parties	July 21, 2023
Last day to disclose initial experts:	August 10, 2023
Last day to disclose rebuttal experts:	September 8, 2023
Close of Discovery:	October 9, 2023
Last day to file Dispositive Motions:	November 8, 2023

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**IT IS SO STIPULATED.**

Dated April 21, 2023.

Dated April 21, 2023.

**THE POWELL LAW FIRM**

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

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**IT IS SO ORDERED:**



DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: April 24, 2023